

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

MOOG INC.,

Plaintiff,

v.

Case No.: 1:22-cv-00187

SKYRYSE, INC., ROBERT ALIN
PILKINGTON, MISOOK KIM, and DOES NOS.
1-50,

Defendants.

DECLARATION OF RENA ANDOH

RENA ANDOH, under penalty of perjury and pursuant to 28 U.S.C. § 1746,
declares the following to be true and correct:

1. My name is Rena Andoh. I am a partner at Sheppard, Mullin, Richter & Hampton LLP. I am over the age of 18 years old. I have personal knowledge of the matters set forth herein and if called as a witness, I could and would competently testify as to all facts set forth herein. I am counsel for plaintiff Moog Inc. (“Moog”) and I provide this declaration in support of Moog’s Motion to Compel.

2. Attached as Exhibit “A” is a true and correct copy of e-mail correspondence dated April 4, 2022 between the parties and iDiscovery Solutions, regarding the electronic devices turned over by defendants Misook Kim and Robert Alin Pilkington.

3. Attached as Exhibit “B” is a true and correct copy of a letter served by counsel for defendant Skyryse, Inc. (“Skyryse”) on April 1, 2022.

4. Attached as Exhibit “C” is a true and correct copy of a letter served by counsel for Moog on April 27, 2022.

5. Attached as Exhibit “D” is a true and correct copy of a letter served by counsel for Skyryse on May 4, 2022.

6. Attached as Exhibit “E” is a true and correct copy of a letter served by counsel for Skyryse on April 29, 2022.

7. Attached as Exhibit “F” is a true and correct copy of a letter served by counsel for Skyryse on May 5, 2022.

8. Attached as Exhibit “G” is a true and correct copy of a letter served by counsel for Moog on May 2, 2022.

9. Attached as Exhibit “H” is a true and correct copy of a letter served by counsel for Moog on May 10, 2022.

10. Attached as Exhibit “I” is a true and correct copy of a letter served by counsel for Skyryse on June 1, 2022.

11. Attached as Exhibit “J” is a true and correct copy of e-mail correspondence between counsel for Moog and Skyryse between May 13 and June 3, 2022 regarding Skyryse’s promised supplemental responses to Moog’s Interrogatories Nos. 2-10 and RFAs Nos. 1-3.

I declare that the foregoing is true and correct under penalty of perjury under the laws of the United States of America.

Dated: June 8, 2022

/s/ Rena Andoh
Rena Andoh